

WHEREFORE, The Goodyear Tire & Rubber Company respectfully moves this Court to enter the proposed stipulated Confidentiality Agreement and Protective Order limiting the disclosure of certain confidential documents and information as set forth above, and for any other relief this Court deems proper.

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CERTIFICATE OF SERVICE

I hereby certify that I have on this 18th day of June, 2018, electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Edward S. Bott, Jr. _____